UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-20454-CR-BLOOM/TORRES

IN RE SEALED INDICTMENT

FILED BY MP D.C.

Nov 28, 2023

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

MOTION TO SEAL

The United States of America, by and through its undersigned Assistant United States Attorney, respectfully requests that the Indictment, arrest warrant(s), and any resulting order be SEALED until the arrest of the first defendant or until further order of this Court, excepting the United States Attorney's Office and any relevant law enforcement agency, which may obtain copies of the Indictment, arrest warrant(s), or other sealed documents for purposes of arrest, extradition, or any other necessary cause, for the reasons that some of the named defendants may flee, the safety of the arresting officers could be compromised, and the integrity of an ongoing investigation may be compromised should knowledge of this Indictment become public. The Assistant United States Attorney is prepared to provide further information *in camera* should the Court so require.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATAORNEY

By:

ELI RUBIN

Assistant United States Attorney

Court ID No. A5503535

United States Attorney's Office 99 Northeast Fourth Street

Miami, Florida 33132

Tel.: 305-961-9247

Email: Eli.Rubin@usdoj.gov